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10 *Attorneys for Defendant Imperial*  
*Pacific International (CNMI), LLC*  
11

12 **IN THE UNITED STATES DISTRICT COURT**  
13 **FOR THE NORTHERN MARIANA ISLANDS**

14 TIANMING WANG, *et al.*,

15 Plaintiffs,

16 v.

17 GOLD MANTIS CONSTRUCTION  
DECORATION (CNMI), LLC; MCC  
18 INTERNATIONAL SAIPAN LTD., CO.; and  
IMPERIAL PACIFIC INTERNATIONAL  
19 (CNMI), LLC,

20 Defendants.

Civil Action No. 1:18-cv-00030

**DEFENDANT'S MOTION TO APPEAR  
BY VIDEO-TELECONFERENCE**

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1 COMES NOW, Defendant Imperial Pacific International (CNMI), LLC (“IPI” or  
2 “Defendant”), by and through undersigned counsel, and hereby requests the Court allow counsel  
3 Kevin T. Abikoff and Daniel H. Weiner to appear by video-teleconference at the hearing on IPI’s  
4 Motion for Reconsideration of Default Judgment on July 29, 2021, at 9:00 a.m. Defendant’s  
5 counsel makes this request for the following reasons:

6 1. Mr. Abikoff does not reside in the Northern Mariana Islands and is currently in Washington,  
7 DC.

8 2. Mr. Weiner does not reside in the Northern Mariana Islands and is currently in New York,  
9 NY.

10 3. Due to the restrictions in place due to COVID-19 and other pre-existing obligations, Mr.  
11 Abikoff and Mr. Weiner cannot travel to Saipan for the hearing on the motion.

12 4. It is Defendant’s understanding that appearances by video-teleconference are “encouraged  
13 when that practice will save the attorneys, parties, or court time and money.” LR 83.4(b).

14 5. An appearance by video-teleconference by Mr. Abikoff and Mr. Weiner would not  
15 prejudice either party.

16  
17 Local counsel Michael Dotts will attend in person. Kevin T. Abikoff can be reached at  
18 (917) 513-6029, and Daniel H. Weiner can be reached at (917) 574-3407.

1 Dated: July 15, 2021

Respectfully Submitted,

2 /s/ Kevin T. Abikoff

Kevin T. Abikoff, Esq. (*Pro Hac Vice*)

3 Daniel H. Weiner, Esq. (*Pro Hac Vice*)

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6 *International (CNMI), LLC*

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Civil Action No. 1:18-cv-00030

**CERTIFICATE OF SERVICE**

21 I hereby certify that on July 15, 2021, I electronically filed the foregoing with the Clerk of  
22 Court for the United States District Court for the Northern Mariana Islands using the CM/ECF  
23

1 system. A true and correct copy of this motion has been served via the Court's CM/ECF system on  
2 all counsel of record.

3 /s/ Kevin T. Abikoff  
4 Kevin T. Abikoff  
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